

March 15, 2017

BY ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Ex Parte Submission - GN Docket 13-111 - Promoting Technological Solutions to
Combat Contraband Wireless Device Use in Correctional Facilities**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. §1.1206(b), Securus Technologies, Inc. ("Securus") hereby submits this Notice of Ex Parte Meeting among the undersigned counsel and Chairman Ajit V. Pai; Rachael Bender, Acting Wireless Advisor to Chairman Pai; Dennis J. Reinhold, Vice President and General Counsel of Securus; Daniel Wigger, Vice President and Managing Director, MAS, Cellblox Acquisitions, LLC ("CellBlox") (an operating subsidiary of Securus); Gregory C. Dozier, Commissioner, Georgia Department of Corrections (GDOC); and Ricky Myrick, Assistant Commissioner, Facilities Division, GDOC.

During the meeting Mr. Wigger and Mr. Reinhold discussed the status, capabilities and other developments regarding CellBlox's Wireless Containment Solution (i.e., enhanced managed access service (MAS) for contraband cellphones), as well as issues presented by the proposed Report and Order and Further Notice of Proposed Rulemaking, FCC –CIRC1703-02 - as reflected on the attached overview. As part of the discussion, Commissioner Dozier and Assistant Commissioner Myrick described examples of actual recent GDOC experiences relating to contraband cellphones in GDOC facilities, including delivery methods (e.g., drones), abuse of 911 access and the trafficking in contraband enabled by such phones. Finally, the participants briefly discussed the costs of MAS deployment and recovery thereof.

March 15, 2017

This Notice is being filed pursuant to ECFS in the referenced docket.

Sincerely yours,



Paul C. Besozzi

Counsel to Securus Technologies, Inc. and CellBlox Acquisitions, LLC.

cc: Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Reilly
Nese Guendelsberger, Acting Chief Wireless Bureau
Roger Noel, Chief, Mobility Division
Rachael Bender, Legal Advisor to Chairman Pai
Claude Aiken, Legal Advisor to Commissioner Clyburn
Erin McGrath, Legal Advisor to Commissioner O'Reilly

Securus Technologies, Inc. - Wireless Containment Solution (WCS)

Enhanced Managed Access Service (MAS) For Contraband Cellphones

Securus is the leading provider of MAS with State DOC acceptance and Active Deployments

Background:

- Invested millions in acquisitions/technologies associated with MAS
- Five active WCS sites; Five additional sites to be completed in 2017
- Active in all pending State DOC Requests For Proposals for MAS
- CTIA Member; Proactive Commercial Mobile Carrier relations and spectrum license process

2016 Success Metrics – Prevented commercial mobile access and device identification:

- Over 1.5M voice calls and 110K+ texts prevented - this is the ultimate purpose/objective
- 2.3K+ contraband cellphones registered by active systems
- Radio activities are logged and recorded (active/idle, attach requests, rejections, other)

WCS is the solution for the corrections industry:

- Highly specialized, private small cell network; Commercially deployed DAS equipment
- Prevents commercial mobile access and non-secure communications from prisons
- Detects *and* provides electronic ID's of contraband devices and details of attempted usage
- Assists with criminal investigations; Data can be integrated into carrier termination process
- Able to provide custom audio and text messages to identified contraband cellphones
- Allows limited "authorized" cellphone communications
- Aligns with overall public safety objectives, including 911 access

WCS is a superior and unique approach:

- Covers all commercially available radio access (GSM, CDMA, WCDMA/UMTS, LTE)
- Provides a WCS Facility User Interface (UI) including system status and intelligent data
- Customized reports provide a foundation for correctional facility and inter-agency action
- WCS is provided "as-a-service" with dedicated resources and remote monitoring
- Assurances that corrections can keep up with mobile network changes at each site
- Correctional staff that is overburdened and limited can focus on other areas of prison operations and administration

MAS costs will decrease:

- Defined policy will generate MAS advancements & cost reductions
- Economies of scale with higher and predictable volumes
- WCS technology partners continue work on platform cost reductions
- Platform virtualization, centralized control in the future

Securus comments – Proposed R&O and FNPRM:

- Support streamlining of leasing and regulatory approval process in order to reduce deployment delays
- Support 911 call routing and PSAP coordination
- Support FCC Contraband Cellphone Ombudsman role
- Support expansion of carrier notification requirements to include, *well* in advance, new or changed use of Frequency Bands, Channel Plans, Protocol Changes, Power Levels, and Antenna Orientations – Proactive vs. Reactive is necessary!
- Support a requirement of CMRS providers to reduce signal strength in rural prison areas with adequate space around the facility
- Support providing substantial evidence & patterns of contraband usage which identifies contraband attempts vs. legitimate usage

Detection only methods, and "potentially" locating and confiscating cellphones, is not the solution! This approach creates more risk to the safety and well-being of correctional officers and removed devices simply get replaced by new contraband cellphones in an endless loop
WCS is the solution!